City of Lansing MS4 NPDES Application Attachment G

Pollution Prevention and Good Housekeeping Program

Response to Application Question #62

Although the City has not yet developed a formal standard operating procedure for updating and revising the inventory of structural stormwater controls owned and/or operated by the City, Public Service Dept. as part of its charge updates the on-file sewer record drawings in a timely fashion following completion of any projects that result in changes to the system. The record drawings depict any new or reconstructed stormwater facilities. In general, the City has record drawings for all stormwater facilities. In addition, the sewer index maps that also depict stormwater facilities are updated consistent with any new facilities.

Response to Application Questions #64 through #69

Regarding the list of prioritized facilities, while endeavoring to comply with MS4 NPDES permit requirements, the City evaluated each of its publicly-owned and/or publicly-operated facilities and determined that there (3) public property operational facilities required development of a Stormwater Pollution Prevention Plan (SWPPP) based upon the associated on-site activities. These three facilities are:

- 1. the Public Service Dept Operations & Maintenance Yard (located at 601 E. South St.);
- 2. the City's Central Garage (located at 312 N. Cedar St.); and
- 3. Mount Hope Cemetery (located at 1709 E. Mount Hope Ave.).

Of note, the site of the Operations and Maintenance Yard is currently being reconfigured, while the Central Garage site is being evaluated for public sale. Both the Central Garage site and the Mt. Hope Cemetery site have limited exposure to stormwater runoff. The SWPPPs for these sites are available for review upon request.

A stormwater management plan for a fourth facility, the City's composting operations, is currently being evaluated, but these operations are likely to be relocated to a different site, so the plans for this action are tentative.

Regarding "a site-specific standard operating procedure" for these facilities, it's assumed that these SWPPPs are essentially site-specific SOPs. For the responses to Questions #66 through #69, we emphasize that for "each facility with the high potential for pollutant runoff" the SWPPPs are available for DEQ review.

Response to Application Questions #71 through #73

Standard Operating Procedure (SOP) 330 (Attachment C, pages III-8 through III-10) provides the City's procedure for catch basin maintenance, but the following should be noted.

In order to assure that all catch basins are cleaned and maintained on an acceptable, rotating basis, the City established cleaning routes consistent with the City's street sweeping routes. Use of these route maps provides Operations & Maintenance (O&M) Division staff with a protocol for approaching catch basin maintenance. For your information, a map showing the areas of each street sweeping route is included with Attachment G. Maps showing the individual routes are also available for information upon request.

The City's goal for frequency of maintenance is to maintain each catch basin at least once every three (3) years, including catch basins in combined sewer areas. With staffing cuts and economic challenges, this frequency is a huge challenge; especially with an MS4 system as large as the City of Lansing's. In conjunction with the routine maintenance, O&M Division staff will provide a greater frequency of catch basin maintenance at specific facilities based upon complaints and other information such as historic/institutional knowledge.

Attachment G (continued)

Response to Application Question #74

The materials removed from catch basin maintenance activities are dewatered at a drying bed located at the City's WWTP and the resulting solid materials are dumped into a roll-off receptacle for ultimate disposal at a local landfill.

Response to Application Question #76

The City and the entire Public Service Dept., Engineering Division, is aware that the Post-construction Controls for New Development and Re-development are required at publicly-owned private property facilities and for construction projects in publicly-owned right-of-way (ROW). Similar to privately-owned development on private property, a site plan is required for City development projects on publicly-owned private property, and staff performing the site plan reviews are required to assure compliance with the post-construction stormwater controls.

Regarding projects in City ROW, the same staff that perform site plan review are project engineers for all construction, and, as such, these staff are required to provide engineering and technical guidance that will result in compliance with post-construction stormwater controls.

As stated many times in these application materials, the associated City ordinances will be revised in the coming months and the revised ordinance will clearly indicate that the post-construction stormwater controls apply to public projects, including those in City ROW.

Response to Application Questions #78 and #79

Standard Operating Procedure (SOP) 310 (Attachment C, pages III-2 through III-4) provides the City's procedure for control of solids and contaminants from the City's paved surfaces, but the following should be noted.

In order to assure that all City streets are swept on an acceptable, rotating basis, the City established street sweeping routes. Use of these route maps provides Operations & Maintenance (O&M) Division staff with a protocol for assuring a uniform approach to sweeping all City streets. For your information, these route maps are included with Attachment G.

The City's goal for frequency of street sweeping is:

- State trunklines and City major streets four (4) times per year
- City local streets two (2) times per year

Although the above statement uses the term "goal", O&M Division staff work diligently to achieve this "goal" and this frequency is generally achieved on an annual basis.

To date, the City has not prioritized street sweeping activities based upon potential water quality impacts. This is due to the fact that, based upon the experience of the City's Operations & Maintenance Division, there is no historical information to support that certain streets are more prone to excessive sediment and dirt/debris. However, as indicated above, the streets and roads with the highest traffic volumes (i.e., State trunklines and City major streets), where sediment and dirt/debris are expected to be greater based upon these greater traffic volumes, are swept twice as often as local streets with a minimum frequency of four (4) times per year. In addition, where demonstrated problems exist or complaints are received, staff will sweep certain sections of roadways on a more frequent basis than that noted above.

<u>Attachment G (continued)</u>

Response to Application Questions #78 and #79 (continued)

Regarding City-owned parking lots and parking ramps, the frequency of sweeping is as follows:

- Parking ramps two-times per month on average
- Surface parking lots every six weeks on average (or greater, based on need).

For surface parking lots and "based on need", many City surface lots are used for events, which can result in litter and debris. After such events, the City's Operations & Maintenance Division will sweep routinely sweep these parking lots.

Response to Application Question #81

Regarding "dewatering and disposal of street sweeper waste material", all waste materials are disposed of at a local landfill. With respect to dewatering of waste material, as indicated in Standard Operating Procedure 310 (see Attachment C, page III-2), the City's procedure requires that liquid from sweeper waste "should always be decanted to the sanitary sewer, never to storm sewers". However, the City's practice is to limit street sweeping activities to times when it is not raining or at times when the streets are generally "dry" following a rain event. Therefore, dewatering or decanting is typically not necessary.

Response to Application Question #83

In conjunction with GLRC participation, the members have purchased have purchased two "Excal" training videos, "Storm Watch" and "Rain Check", that are designed to provide an emphasis on good housekeeping and pollution prevention techniques. In addition, the City has developed three separate PowerPoint presentations that are geared toward training of O&M Division staff relative to:

- 1. pollution prevention for fleet maintenance and storage yards;
- 2. control of solids and contaminants from the City's paved surfaces; and
- 3. managing vegetated properties.

These PowerPoint presentations can be made available for review upon request.

Regarding staff training frequency, training on all MS4 related matters was conducted over several days in fall of 2012. Small groups of newly hired employees will be trained within one year of their hire date, and training for all staff will be conducted at least once during each five-year period.

Response to Application Question #84

The City has developed special provisions that are included with each construction contract issued by the City. The City's special provision for Soil Erosion and Sedimentation Control requires the contractor to do the following.

"Streets, parking lots, and driveways as directed by Engineer in which new construction is taking place shall be swept every Wednesday and Saturday between the hours of 2:00 a.m. and 6:00 a.m. over the entire duration of the project. Streets adjacent to the project, which are used for haul routes, shall be swept within 1000 feet of the project streets on the same schedule. All streets within the influence of construction and streets used as haul routes shall be swept upon final completion of the project. Dust and debris shall be dampened sufficiently by the sweeping equipment to eliminate dust dispersal during sweeping. If, in the opinion of the Engineer, the sweeping equipment cannot sufficiently dampen the dust, a water truck shall be required". Regarding "as directed by the Engineer", the City requires that street sweeping to occur at least

twice per week. For your information, a copy of this special provision is attached.